

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE  
DISTRICT OF TENNESSEE**

Dr. Regina Jordan-Sodiq,  
Plaintiff

v.

State of Tennessee et. al.,  
Defendants and Fifth Third  
Bank, Defendant )

Case No.: 3:25-cv-00288

Judge Eli Richardson Jury Demand

**PLAINTIFF'S REPLY IN SUPPORT OF MOTION TO COMPEL**

Plaintiff Dr. Regina Jordan-Sodiq files this Reply in Support of her Motion to Compel Disclosure of Hearing Date ("Motion to Compel") [ECF 69] and responds to Defendant Fifth Third Bank's opposition [ECF 76] as follows:

1. **Plaintiff's Diligent Efforts to Obtain a Hearing Date:** Plaintiff has repeatedly contacted the District Court requesting notice of a hearing date for pending motions and has consistently been informed that no hearing date has been set. Plaintiff's continued efforts to obtain this information reflect a good-faith attempt to comply with scheduling requirements and properly prepare responses.
2. **Plaintiff's Good-Faith Attempt to Confer:** Defendant asserts that Plaintiff failed to confer in good faith prior to filing the Motion to Compel. However, Plaintiff attempted to engage with opposing counsel via phone call May 22, 2025 and email **Exhibit B**, yet received no response. Given Defendant's lack of engagement, Plaintiff had no alternative but to seek Court intervention, in full compliance with Local Rule 37.01(a).
3. **Defendant's Prematurity Argument Is Misplaced:** Defendant argues that Plaintiff's Motion to Compel is premature due to its pending Motion to Dismiss. However, obtaining clarity on scheduling directly impacts Plaintiff's ability to prepare procedural responses in accordance with court deadlines. The requested disclosure promotes procedural fairness and efficiency.
4. **Registered Agent Disclosure and Return to Sender Issue:** Defendant states that its registered agent's information is publicly available yet fails to provide explicit details within its response. Furthermore, Plaintiff mailed a formal notice to Defendant's registered agent and the attorney who filed the Motion to Dismiss. However, Plaintiff received a "**Return to Sender**" letter, raising concerns regarding proper service and procedural fairness. Plaintiff has also emailed Defendant's attorney and will use the **CM/ECF electronic filing system** to ensure formal service and record preservation. Plaintiff seeks confirmation of the correct address for service to ensure compliance with procedural rules.



- **Exhibit A:** Attached hereto is a copy of the return-to-sender correspondence addressed to Defendant's registered agent and counsel, further evidencing service difficulties.
- **Exhibit B:** Attached hereto is a copy of the email dated 22 May 2025 addressed to [KRogers@burr.com](mailto:KRogers@burr.com), given as the email address for the Defendant's attorney.

For the foregoing reasons, Plaintiff respectfully requests that the Court grant her Motion to Compel and direct Defendant to engage in good-faith resolution of the matters at issue.

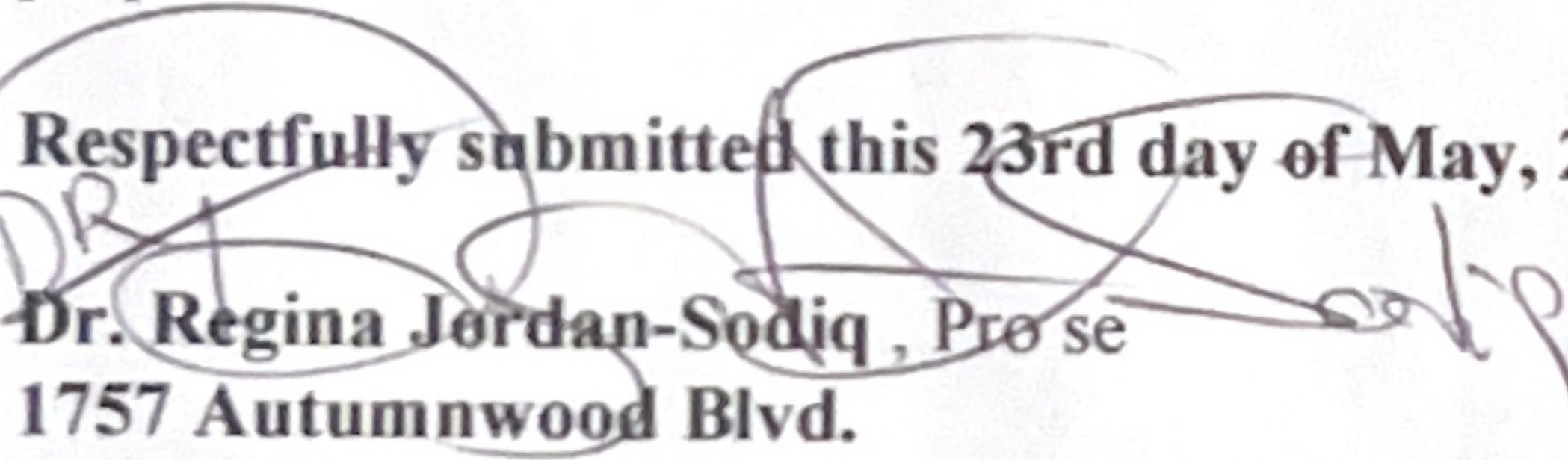
#### **CERTIFICATE OF SERVICE**

I hereby certify that on this **23<sup>rd</sup> day of May 2025**, a true and correct copy of **PLAINTIFF'S REPLY IN SUPPORT OF MOTION TO COMPEL** was served via **electronic filing** upon the following:

**Defendants' Counsel:** Katherine R. Rogers, Burr & Forman, LLP; email: [kr Rogers@burr.com](mailto:kr Rogers@burr.com) and their Registered Agent Corporation Service Company located at as per "return to sender" envelope, 300 Montvue Road Knoxville TN 37919.

Pursuant to the Tennessee Rules of Civil Procedure, electronic service of this filing is deemed proper and effective.

Respectfully submitted this 23<sup>rd</sup> day of May, 2025.

  
Dr. Regina Jordan-Sodiq, Pro se  
1757 Autumnwood Blvd.  
Clarksville, TN 37402 ;G4818@yahoo.com



IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE

DR REGINA Jordan-Soto  
Plaintiff(s),

Case Number 3:25-CV-00288

v.

Judge Judge Eli Richardson

State of Tennessee et al.  
Defendant(s).  
Fifth - Third Bank Defendant

Magistrate Judge Jimmy Demand

Plaintiff Reply in Support of Motion to Compel  
and Exhibits (Type of Pleading)

① Exhibit A: Attached is a copy of "Return to Sender"  
correspondence addressed to both Defendant's Attorney  
K. Rogers and Registered Agent C&C Corporation  
Service Company

② Exhibit B: Attached is a copy of email  
dated 22 May 2025 addressed to krogers@burr.com

①



**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the (pleading) Reply in Support of Motion to Compel  
has been served on:

and exhibits

(Name)  
(Address)  
(City, State, Zip)

Kimberly S. Veirs  
214 Church Street  
Nashville TN 37203

(Name)  
(Address)  
(City, State, Zip)

Katherine R. Rogers  
222 1/2 2nd Ave South  
Nashville TN 37203

(Name)  
(Address)  
(City, State, Zip)

Johnny Russell Ross  
206 1/2 3rd St  
Cincinnati TN 37040

(Name)  
(Address)  
(City, State, Zip)

Jason W. Colton  
751 L. Hayes St  
201 Commerce Street  
Nashville TN 37203

(Name)  
(Address)  
(City, State, Zip)

Tracey Knight  
202 1/2 3rd Street  
Nashville TN 37203

(Name)  
(Address)  
(City, State, Zip)

Christopher Murphy  
201 1/2 3rd St  
1320 Adams St, Suite 1400

(Name)  
(Address)  
(City, State, Zip)

Nashville TN 37203  
600 Peachtree Street, NE, Suite 300  
Atlanta GA 30308

(Name)  
(Address)  
(City, State, Zip)

John H. Dallerhick  
Dallas Snow LLC  
1500 2nd Avenue South Suite 1600  
Nashville TN 37201

(Name)  
(Address)  
(City, State, Zip)

Loie William Schmitt  
3100 West End Ave Suite 1100  
Nashville TN 37203

on the \_\_\_\_\_ day of \_\_\_\_\_

22  
Signature

Continue -

(2)



# CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing  
has been served on:

(Name)

(Address)

(City/State/Zip)

(Name)

(Address)

(City/State/Zip)

(Name)

(Address)

(City/State/Zip)

(Name)

(Address)

(City/State/Zip)

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(Name)

(Address)

(City/State/Zip)

(Name)

(Address)

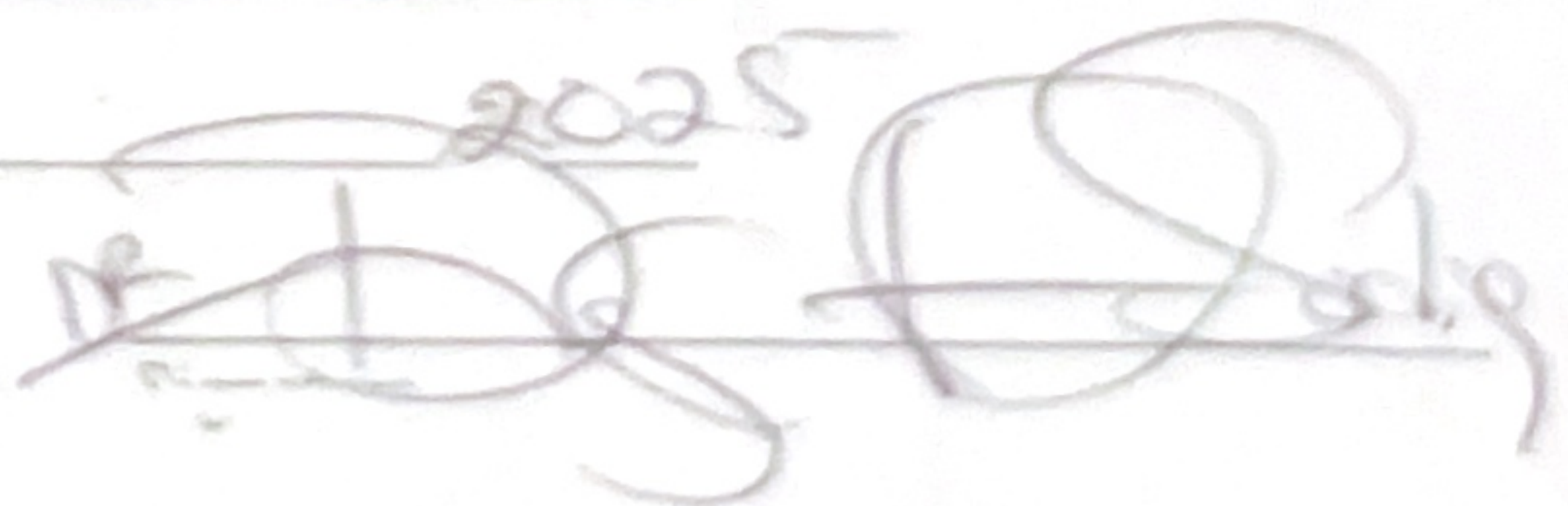
(City/State/Zip)

(Name)

(Address)

(City/State/Zip)

on 23<sup>rd</sup> MAY

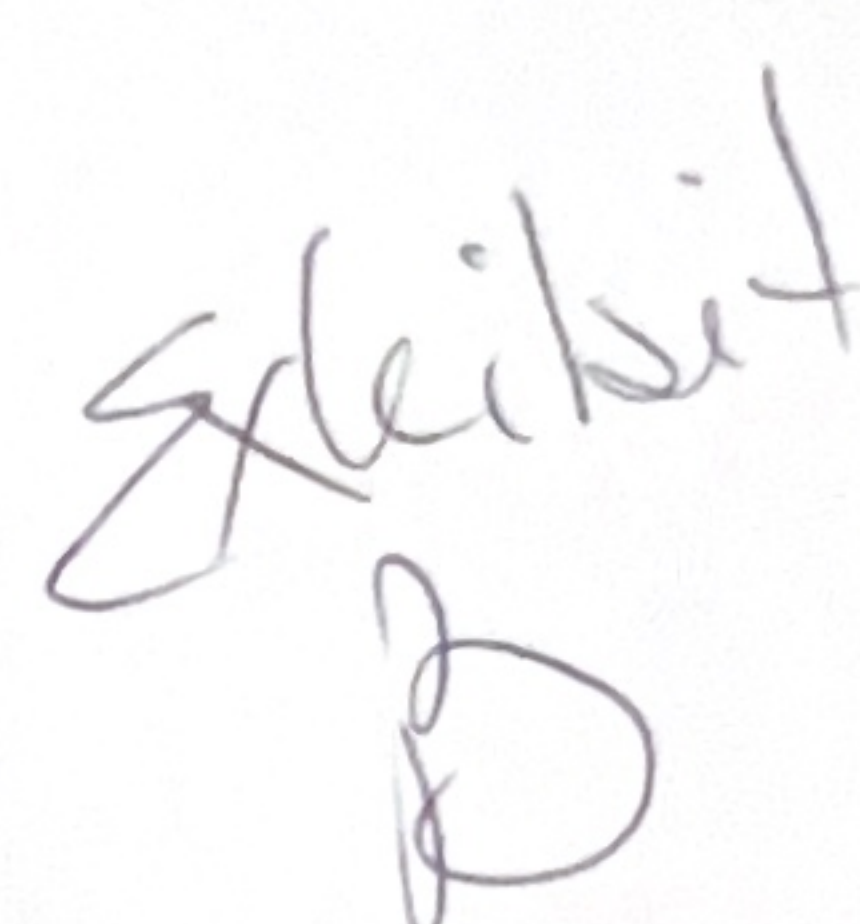
2025  




(Address & Telephone Number, if any)

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Plaintiff's Attempt to Confer Defense Counsel  
From:regina jordan (g4818@yahoo.com)  
To:krogers@burr.com  
Date:Thursday, May 22, 2025 at 11:10 AM CDT

## Message Body

**Subject:** Follow-Up on Motion to Compel

Dear Katherine R. Rogers, Esq.,

Today, I called your office regarding Fifth Third Bank's response to my Motion to Compel. My call was forwarded to your legal assistant's Angela Beasley's, voicemail, but I did not leave a message at the time.

I wanted to follow up to ensure my inquiry reaches the appropriate party. Specifically, I seek clarification regarding Fifth Third's assertion that my request is premature due to their pending Motion to Dismiss, which they claim is dispositive. I would like to discuss how this impacts the necessity of disclosure, particularly given that hearing dates and registered agent information should be readily available for transparency in legal proceedings.

Please advise on how best to proceed or if there is a preferred method for discussing this matter further. I appreciate your time and assistance.

Best regards,  
Dr. Regina Jordan-Sodiq, Pro se



